

UNITED STATES DISTRICT COURT FOR THE
DISTRICT OF NEW JERSEY

**THERMOLIFE INTERNATIONAL, LLC, an
Arizona limited liability company, RON
KRAMER, an Arizona resident,**

Plaintiffs,

v.

**ANTHONY CONNORS a/k/a ANTHONY
ROBERTS and JANE DOE CONNORS,**

Defendants.

DOCUMENT ELECTRONICALLY
FILED

Case No. 2:13-cv-4399 (KM) (MCA)

**PETITION FOR AN ORDER
FOR DISCOVERY PURSUANT TO
FED R. CIV. P. 69 AND N.J. CT. R.
4:59-1(e) & R. 6:7-2**

Reed Smith LLP, counsel for Plaintiff/Judgment Creditors ThermoLife International, LLC and Ron Kramer (together, "ThermoLife") in the above-captioned action, respectfully submits this petition for an order for discovery pursuant to Fed. R. Civ. P. 69 and N.J. Ct. R. 4:59-1(e) and R. 6:7-2, and states that:

1. On March 17, 2014, ThermoLife recovered a judgment against Defendant Anthony Connors a/k/a Anthony Roberts ("Defendant/Judgment Debtor Anthony Connors") in the amount of \$530,000. A copy of the judgment is attached hereto as Exhibit A.

2. ThermoLife has not received any payment on the judgment from the Defendant/Judgment Debtor Anthony Connors.¹

¹ Nor has the Defendant/Judgment Debtor Anthony Connors complied with the terms of the injunctive relief ordered by the Court.

3. Upon information and belief, Defendant/Judgment Debtor Anthony Connors maintains his principal residence at 132 Lawrence Avenue, Hasbrouck Heights, New Jersey 07604.

4. ThermoLife therefore seeks the entry of an order from this Court:

a. directing Defendant/Judgment Debtor Anthony Connors to appear, testify under oath, and make discovery concerning all assets, including, but not limited, to real property and personal property, owned or controlled by Defendant/Judgment Debtor Anthony Connor, personally, through an entity in which Mr. Connors has any ownership or controlling interest, or otherwise, including, but not limited to, marital assets, assets owned with another person(s), or assets to which Defendant/Judgment Debtor Anthony Connors otherwise has access, all as further set forth in Paragraph 4(b) below,- before counsel for ThermoLife, at Reed Smith LLP, 136 Main Street Suite 250 Princeton, New Jersey, on the 8th day of June, 2015, at 10:00 a.m.

b. directing Defendant/Judgment Debtor Anthony Connors to produce on May 29, 2015, prior to the deposition described above, all books, records, communications, correspondence or other documents (in hard copy, electronic format, or otherwise) disclosing, evidencing, relating to, regarding, identifying, listing, concerning, or otherwise noting the existence and/or location of any assets, including, but not limited, to real property and personal property, owned or controlled by Defendant/Judgment Debtor Anthony Connors, personally, through an entity in which Mr. Connors has any ownership or controlling interest, or otherwise, including, but not limited to, marital assets, assets owned with another person(s), or assets to which Defendant/Judgment Debtor Anthony Connors otherwise has access, including, but not limited to:

- all banking records, including, but not limited to, monthly, quarterly, and annual banking statements; cancelled checks; tax statements; interest

statements; or other communications received from banking institutions, including United States and foreign banking, or other financial, institutions, for the period of January 1, 2005 to the present;

- all records – including, but not limited to, monthly, quarterly, and annual statements; tax statements; interest statements; and other communications – disclosing, evidencing, relating to, regarding, identifying, listing, concerning, or otherwise noting the existence and/or location of domestic or foreign stocks and other securities for the period of January 1, 2005 to the present;
- all other financial statements including, but not limited to, documents that reflect, disclose, evidence, regard, list, concern, or relate to income, interest, dividends, sales, purchases, taxes, gains, or losses for the period of January 1, 2005 to the present;
- all paystubs, W-2 or 1099 forms, or other records of payments received for work performed (as an employee or otherwise) for the period of January 1, 2005 to the present;
- all receipts or other records of gifts made or received for the period of January 1, 2005 to the present;
- all Federal, State, and Local income tax returns, including any supporting forms or documents, for the period of January 1, 2005 to the present;
- all documents evidencing a security interest, mortgage, or insurance policy in favor of Defendant/Judgment Debtor Anthony Connors for the period of January 1, 2005 to the present;
- all documents evidencing the ownership of other property including but not limited to motor vehicles, boats, or real estate for the period of January 1, 2005 to the present;
- all checks, wires, or payments of any kind made to Defendant/Judgment Debtor Anthony Connors for the period of January 1, 2005 to the present;
- all documents relating to any past or current lawsuits, arbitrations, or other legal proceedings in which Defendant/Judgment Debtor Anthony Connors was or is a party;
- all documents evidencing the location and contents of any safe or safe deposit boxes for the period of January 1, 2005 to the present;
- all documents evidencing the ownership of the property located at 132 Lawrence Avenue, Hasbrouck Heights, New Jersey 07640;

- all documents identifying, evidencing or otherwise listing any websites or domain names that are owned, controlled, maintained, or operated for the period of January 1, 2005 to the present;
- all documents evidencing any employment or consulting agreements entered into during or for the period of January 1, 2005 to the present;
- all documents evidencing any trusts created for Defendant/Judgment Debtor Anthony Connors's benefit or for which Defendant/Judgment Debtor Anthony Connors is a trustee or has access;
- all documents evidencing the existence of cash in the possession of Defendant/Judgment Debtor Anthony Connors for the period of January 1, 2005 to the present;
- all documents evidencing assets, including but not limited to real or personal property, or the possible existence of assets in which of Defendant/Judgment Debtor Anthony Connors has or may have had any interest for the period of January 1, 2005 to the present.

REED SMITH LLP

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Attorneys for Plaintiffs/Judgment Creditors
 ThermoLife International, LLC and Ron Kramer

Dated: May 4, 2015

CERTIFICATE OF SERVICE

I hereby certify that I caused the foregoing Petition for an Order For Discovery Pursuant to Fed. R. Civ. P. 69 and NJ. Ct. R. 4:4:59-1(e) & R. 6:7-2 and Proposed Order to be filed with the Clerk of Court using the Court's Electronic Filing System and that a true and correct copy of said filing was served on Defendants by overnight mail on:

Mr. Anthony Connors
132 Lawrence Avenue
Hasbrouck Heights, New Jersey 07640

Dated: May 4, 2015

By: /s/ Shana E. Russo